REMARKS

Claims 1-19 are currently pending, with claims 1, 8, 14 and 15 being the independent claims. Claims 1, 8, 14 and 15 have been amended. Support for the amendment to the claims may be found, for example, in Figs. 1 and 2 of the originally filed drawings. Reconsideration of the application, as amended, is respectfully requested.

In the Office Action dated February 27, 2006, independent claims 1, 8, 14 and 15, and dependent claims 2-7, 9-13 and 16-19 were rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 6,301,471 ("*Dahm*"). For the following reasons, it is respectfully submitted that all claims of the present application are patentable over the cited reference.

The Office Action (pg. 2 thru 3) states:

> Dahm ... teaches, a system for processing of data to and from a mobile terminal (i.e., fig. 2b), a mobile terminal comprising a data bus for receiving and transmitting data to a wireless communication network (i.e. fig. 2b, mobile 250 includes data buses for bi-directional wireless communication), **an output device for presenting at least one of audio, video and texture information to a user (i.e. fig. 2b, display 260)**, an interface module connected to the data bus of the mobile terminal (i.e. fig. 2b, interface 252 and 264), a protocol stack for processing data to and from the data bus of the mobile terminal (i.e. fig. 2b, shows the protocol for processing data), the user agent for decoding data to and from the protocol stack (i.e. fig. 2b, client module 256 and 264), a signal generator for converting the decoded data from the user agent into signals formatted for processing by the output device so that the output device presents at least one of audio, video, and textual information to the user (i.e. fig. 2b, 256, 264, 260 and processor).
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> However, Dahm does not require the interface module to include a protocol stack, a user agent and signal generator as claimed. In contrast, these limitations are taught to be integral along with the interface module in the mobile device. Despite the difference, there is no distinct functional advantage of having these limitations configured within the interface module as claimed. The use of a one piece construction instead of separable, having the same result would be merely a matter of obvious engineering design choice, In re Larson, 144 USPQ 347 (CCPA 1965).
> (Emphasis Added)

With respect to the foregoing, the following is noted. *Dahm* relates to a system and method which permits mobile service providers to identify subscribers who may be at risk to churning, and once identified, present those identified with an opportunity to review and execute an upgraded

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service plan better suited to their needs (see col. 3, lines 53-59). *Dahm* states, "the system and method allows the identified mobile subscribers to efficiently, visually and interactively, review the offered mobile service plan better meeting the subscriber's needs. The subscriber can review and execute the offer using the display and interface of a mobile device" (Abstract). However, *Dahm* fails to teach an interface that is connected to the data bus of a mobile terminal and an output device, where the output device is remotely located from the mobile terminal, as recited in amended independent claims 1 and 14.

Dahm (col. 4, lines 28-48; Fig. 1) teaches a data communication system in which the disclosed invention may be implemented. *Dahm* (col. 4, lines 30-33) states, "landnet 100 is a landline network that may be the Internet, an intranet or a data network of other private networks. Coupled to landnet 100 are a personal computer (PC) 110 and a customer service server 104". *Dahm* (col. 4, lines 33-40) further states, "personal computer 110 may be a desktop computer (e.g., an IBM compatible computer) and run a HyperText Markup Language (HTML) browser (e.g., Netscape Navigator from Netscape Communications Corporation) via landnet 100 using HyperText Transfer Protocol (HTTP) to access information stored in customer service server 104". Thus, *Dahm* teaches that information stored in the customer service server 104 includes user account information and customer profiles for all user accounts serviced by a carrier, and contains applications that permit the generation of customized customer offer messages or letters and process on-line applications for extended or additional subscriber services.

However, *Dahm* fails to teach that the personal computer (PC) 110, which a person having the ordinary level of skill in the art would readily appreciate includes a display (i.e., an output device), is connected to the data bus of the mobile station 106 <u>and</u> the UDP interface of 252 of the mobile station shown in Fig. 2, where the display is located remotely from the mobile station. Rather, *Dahm* teaches that the PC 110 having the display is connected to landnet 100.

Dahm (col. 4, lines 49-60; Fig. 1) teaches a private network 120 including a computer 124 and a server 122. *Dahm* (col. 4, lines 50-52) states, "the private network 120 is protected by a firewall 121 protecting resources of the private network 120 from users on other networks". *Dahm* (col. 4, lines 52-56) also states, "private network 120 is typically used in a corporate configuration in which secure information (e.g. billing records) is kept in server 122 and accessible only by computing devices, such as computer 124, on the private network 120". Thus,

Dahm teaches that data flows from the computer 124 to landnet 100. More importantly, *Dahm* teaches away from sending data to the computer 124 from the mobile station 106, since the computer 124 is isolated behind the firewall 121. Consequently, the computer 121 could never be attached to the UDP 252 of the mobile station shown in Fig. 2B. Therefore, *Dahm* fails to teach the claimed configuration.

    Dahm (col. 9, lines 17-22) states, "mobile device 250 includes a corresponding WCP interface 252 that couples to wireless network 245 via a RF transceiver (not shown) to receive incoming and outgoing data signals. It is understandable that WCP interface 252 is implemented with a UDP interface, as does WCP interface 206, when wireless network 245 operates HDTP." *Dahm* (col. 9, lines 22-25) further states, when "other wireless communication protocol is operated in wireless network 245, both WCP interface 252 and WCP interface 206 are readily implemented accordingly so that proxy server 200 and mobile device 250 can understand and communicate [with] each other." In addition, *Dahm* (col. 9, lines 28-29) states, "device identifier (ID) storage 254 supplies a device ID to UDP interface 252". *Dahm* (col. 9, lines 39-45) also teaches that the "client module 256 is coupled to UDP interface 252 for the establishment of a communication session and the requesting and receiving of data. Additionally, the client module 256 operates, among other things, a browser 264, commonly referred to as micro-browser, requiring much less computing power and memory than well-known HTML browsers do."

    Dahm (col. 9, lines 28-38) states, "device identifier (ID) storage 254 supplies a device ID to UDP interface 252. The device ID identifies a specific code that is associated with mobile device 250 and directly corresponds to the device ID in the user account provided in proxy server device 200. In addition, mobile device 250 includes a client module 256 that performs many of the processing tasks performed by mobile device 250 including establishing a communication session with proxy server device 200, requesting and receiving data from carrier network 208, displaying information on a display screen 260 thereof, and receiving user input from keypad 262 as well. The client module 256 is coupled to UDP interface 252 for the establishment of a communication session and the requesting and receiving of data". That is, (col. 9, lines 17-22) teaches nothing more than the internal configuration of the disclosed mobile station.

    However, independent claim 1 is directed to a system ... comprising a mobile terminal comprising a data bus ... <u>an output device remotely located from the mobile terminal</u>, and an

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interface module connected to the data bus of the mobile terminal and the output device. *Dahm* fails to teach this claimed configuration.

The Examiner acknowledges *Dahm* fails to teach that the interface module (252) includes a protocol stack, a user agent and signal generator. The Examiner states *Dahm* teaches these elements are "integral along with the interface module in the mobile device", and also states that "there is no distinct functional advantage of having these limitations configured within the interface module as claimed". Amended independent claims 1 and 14 recite that the output device is <u>remotely located from the mobile terminal</u>, and that the interface module is connected to the data bus of the mobile terminal and is also connected to the output device. *Dahm* fails to teach this configuration. Combining the interface (252) and the client module (265) <u>within</u> the mobile station in the manner asserted by the Examiner cannot meet the claimed configuration. The system of claim 1, for example, includes a mobile phone that has its own display. Claim 1 further requires that at least one of audio, video, and textual information be presented to a user on an output device (i.e., a display) that is remotely located from the mobile terminal. Even assuming *arguendo* that it is correct to conclude that the protocol stack, user agent and signal generator could be integral along with the interface module in the mobile station taught in *Dahm*, such a configuration would still fail to achieve the claimed invention. In *Dahm*, the data is output to the display of the <u>mobile station</u>. Amended independent claim 1, however, recites that at least one of audio, video, and textual information is presented to a user on the display that is <u>remotely located</u> from the mobile terminal. That is, the display that presents the data output from the interface module cannot be included within the mobile terminal, as asserted by the Examiner. In view of the foregoing, *Dahm* fails to teach the invention recited in amended independent claims 1 and 14. Therefore, reconsideration and withdrawal of the rejections under 35 U.S.C. §103 are in order, and a notice to that effect is requested.

Independent claims 8 and 15 are method claims associated with independent system claims 1 and 14, respectively. Accordingly, independent claims 8 and 15 are patentable over *Dahm* for the reasons discussed above with respect to independent system claims 1 and 14.

In view of the patentability of independent claims 1, 8, 14 and 15, for the reasons set forth above, dependent claims 2-7, 9-13 and 16-19 are all patentable over the prior art.

Based on the foregoing amendments and remarks, this application should be in condition for allowance. Early passage of this case to issue is requested.

It is believed that no fees or charges are required at this time in connection with the present application; however, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,

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